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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK

**[PROPOSED] ORDER CONCURRENTLY  
SUBMITTED BY GOOGLE WITH JOINT  
SUBMISSION IN RESPONSE TO DKT.  
191, 191-1 RE: STATUS OF DISCOVERY  
DISPUTES**

Judge: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is the parties' Joint Submission in Response to Dkt. 191, 191-1 Re: Status of Discovery Disputes ("Joint Submission") and Defendant Google LLC's ("Google") [Proposed] Order Concurrently Submitted With Motion ("Proposed Order"). Having considered the parties' Motion, Google's Proposed Order, argument by counsel, and all other matters properly considered by this Court, the Court finds there is good cause to **GRANT** Google's Proposed Order as follows:

1. Each party shall identify all affirmative disputes it seeks to raise at least seven (7) business days before a joint submission due date.

2. Each party shall send its respective sections on the affirmative disputes they identify at least five (5) business days before a joint submission due date. Each section is limited to 75 words, which can be extended to no more than 125 words upon agreement by the parties.

3. Each party shall exchange responses to the other party's affirmative disputes, also limited to 50 words, at least four (4) business days before a joint submission due date.

4. A final exchange of revised sections shall occur four hours before the joint submission is due or by 2 p.m. PST on the day of the submission, whichever is earlier.

5. This schedule can be amended by agreement of the parties for any specific disputes that require a modified exchange schedule (*e.g.*, in the event of ongoing meet and confer efforts).

**THEREFORE, IT IS ORDERED** that, for the reasons stated in the Joint Submission, Google's Proposed Order is **GRANTED**.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge